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6 ALTERNATIVES ANALYSIS

INTRODUCTION

CEQA requires a discussion of alternatives to the project to inform public decision-makers of the various environmental impacts associated with each alternative. This information allows decision-makers to formulate a reasoned judgment on each alternative to determine which is the environmentally superior choice. State CEQA Guidelines Section 15126(d) provides the following description of the requirements of an Alternatives section in an EIR:

Alternatives to the Proposed Action. Describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.

This section of the EIR discusses three alternatives to the Project, including the No Project Alternative, and also provides a discussion of alternatives that were considered and rejected based on the criteria established through project scoping.

DEVELOPMENT OF ALTERNATIVES

The alternatives were developed to satisfy the requirements of CEQA and the CEQA guidelines. Section 15126 of the CEQA guidelines requires an EIR to "describe a range of reasonable alternatives to the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project." A "No Project" alternative should be included and should describe the impacts associated with existing conditions, as well as impacts that would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. The alternatives analyzed in this EIR include the No Project alternative, the Sport Use Only alternative, and an alternative site.

To ensure that a reasonable range of alternatives will be considered under CEQA, three alternatives are being considered to represent a wide spectrum of potential solutions. The CEQA guidelines were followed in the development of site selection criteria, then applied those criteria to the project as a whole, for the various alternative sites. Our goal was to describe the facts and rationale by which rejected sites were deemed infeasible. In all cases, the sites to be considered were adjacent to- or one interchange away from- (in the case of lateral State routes) of the Interstate 5/205 corridor between the junction of Interstate 580/205 and State Highway 12/I-5, south of Sacramento (Figure 1). This rationale was consistent with the regional emphasis of the project, namely to serve the sports needs of both the San Francisco Bay and Sacramento metropolitan areas while allowing major freeway access. Elements from the public scoping meeting and Notice of

Preparation were taken into account during the development of the above rationale and selection criteria.

Selection Criteria

1. The site does not contain State classified Class I and II prime farmland or land under Williamson Act Contract.
2. The site is located in close proximity to a wastewater treatment facility (recycled water source).
3. The site is contiguous with adjacent developed lands of an incorporation or lands planned for future development within the sphere of influence of a city or town.
4. The site would not be located in close proximity to lands zoned for low to medium residential uses (parcels zoned very low-density residential were not considered).
5. Potable water supplies would be available for the project as evidenced from specific supply problems stated in public documents.
6. The site would be of suitable acreage (i.e. about 400 acres in size) to accommodate the proposed project.

ALTERNATIVES CONSIDERED AND REJECTED

The following sites were analyzed and scored based on the selection criteria (Figure 6-1). However, each of these sites failed to meet at least one of the screening criteria and were therefore dismissed as a viable alternative. No alternative sites were available or feasible in the City of Lodi as a parcel of adequate size could not be identified. A set of parcels from multiple owners would be required to locate the project on an alternative site in the City. The City is essentially built-out within its northern planning area boundary at the Mokelumne River. Most undeveloped areas are designated for single family residential development, are primarily high cost agricultural lands, or are too far from the freeway or major roadway to accommodate such uses. In addition, the site would need an adequate water supply for irrigation of the sports fields and landscaping. Other undeveloped lands are zoned for industrial and heavy commercial uses. Development of these sites would require a General Plan amendment and zoning change to permit project development. The following sites are located outside of the Lodi City limits.

Flag City (I-5 and State Route 12 South of the Highway).

The San Joaquin County General Plan 2010 Figure VI-3 shows Class I and II prime farmland on portions of the parcels chosen. The site is more than a mile from the nearest wastewater treatment facility and source of recycled water. The Flag City area is not incorporated or within the sphere of influence of a city as identified in a General Plan and therefore is within the jurisdiction of the County. This site failed to meet criteria 1 (in part), 2, 3, and 5.

Stockton at Eight Mile Road

This site is located west of I-5 and south of Eight Mile Road, adjacent to low and medium density residential uses. The site is more than a mile from the nearest wastewater treatment facility and source of recycled water. The Stockton site failed to meet criteria 2 and 4.

Lathrop Northwest of Louise Avenue/ I-5 Interchange

This site is just northwest of the freeway interchange between the freeway and Stanford Boulevard (future extension of Golden Valley parkway). The Lathrop Comprehensive General Plan and EIR show extensive Williamson Act contract lands at and adjacent to the site. The site is more than a mile from the nearest wastewater treatment facility and source of recycled water. The Lathrop Comprehensive General Plan 1997 Map shows medium to low density residential areas planned for adjacent areas. Potable water is entirely from wells projected to become more saline as the water table drops. Therefore, this site failed to meet criteria 1, 2, 4, and 5.

Tracy at McArthur Road Interchange

The Tracy site is northeast of the McArthur Road/I-205 interchange, planned for Agricultural Use in the City of Tracy Land Use Plan (1993). The San Joaquin County General Plan 2010 Figure VI-3 shows Class I and II prime farmland on portions of the parcels chosen. Depending upon the accuracy of mapping, and the parcel(s) actually chosen, criteria 1 might pass. This site failed to meet criteria 1 (in part).

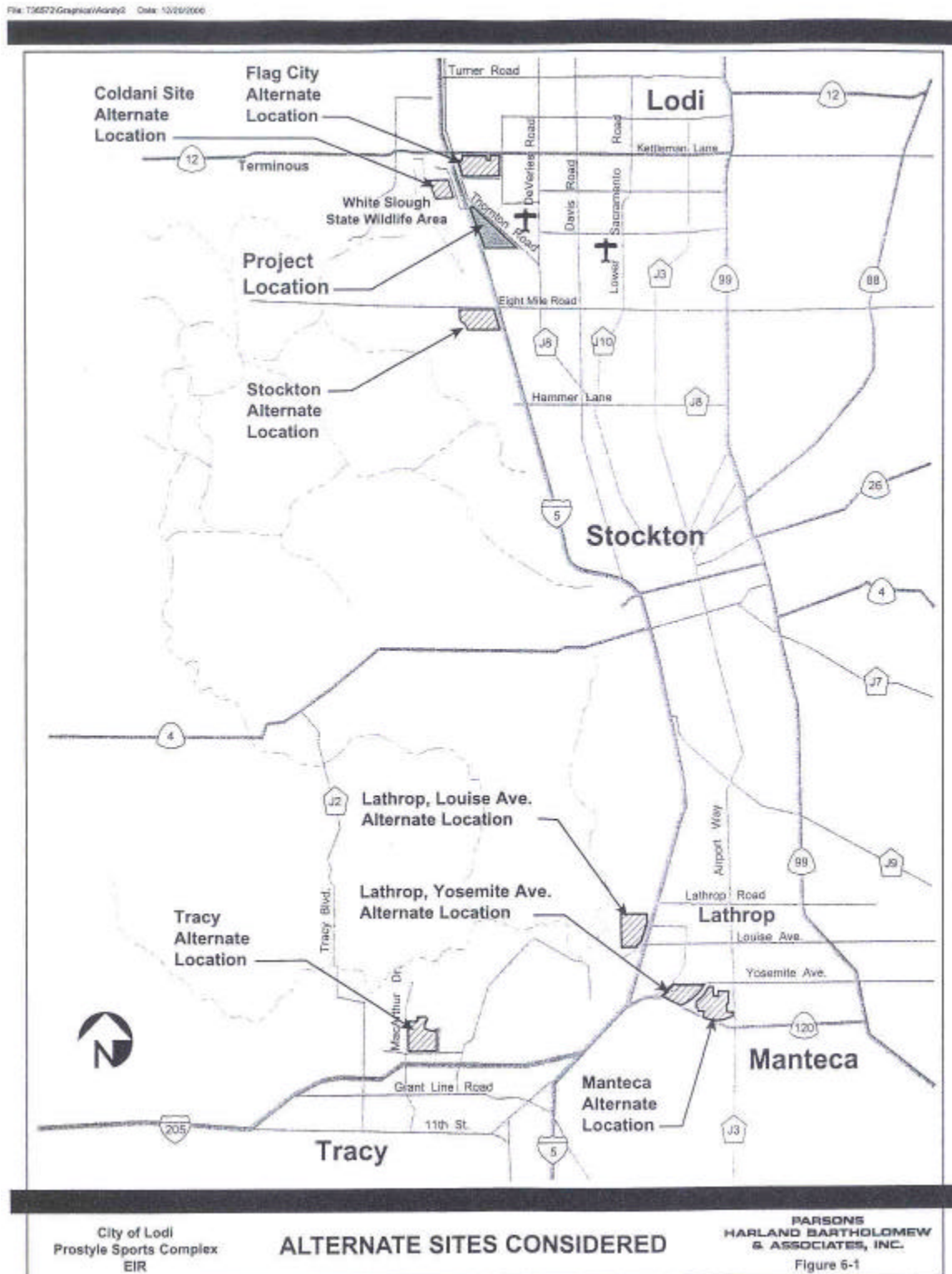
Lathrop at Yosemite Avenue Interchange East of I-5

This site is a parcel southeast of the State Route 120 freeway interchange at Yosemite Avenue just north of the UPRR and adjacent to an identified aggregate mineral potential mining area. General Plan Map designates the site as LI - light industrial. Potable water is entirely from wells projected to become more saline as the water table drops according to the Lathrop Comprehensive General Plan and EIR (1991 [amended 1997]). The Lathrop site failed to meet criteria 5.

Coldani Site

The Coldani site is west of I-5 and north of White Slough Wastewater Treatment Plant adjacent to the White Slough State Wildlife Area. The 315-acre site is under Williamson Act contract in San Joaquin County and is adjacent to other agricultural lands. The site is accessible via I-5 to Thornton Road then under the I-5 underpass to the western frontage road along I-5. This site does not meet three of the six criteria, criteria 1, 3 and 6.

FIGURE 6-1: ALTERNATE SITES CONSIDERED



PROJECT ALTERNATIVES

The three project alternatives, including the No Project Alternative are described in the following sections:

No Project Alternative

The No Project alternative would maintain current land uses as the project would not be constructed. This alternative assumes that the project site would continue to be leased to agricultural operations and would be used in the same or similar manner as it is presently used. The No Project Alternative maintains the site in agricultural use and continues to dispose of treated effluent from White Slough WPCF on the site. This alternative also assumes that current recreational areas in the City and surrounding communities are adequate to accommodate the region's recreational needs. This alternative does not support the generation of revenues that would benefit the City's tax structure and overall increase in economic activity resulting from additional visitors to the area. Future development of the parcel with permissible uses would be feasible under this alternative. No future development has been planned in the City or County General Plans for this site. Therefore, it is uncertain how this site will be developed or utilized in the future.

Impacts

This alternative will not result in new impacts as the site will remain in its current use. No new impacts to land use, geology, biological resources, cultural resources, public services, energy, aesthetics, traffic, air quality, or noise would occur as the current status would be maintained.

Manteca Alternate Site

The Alternate Site Development alternative would result in the construction and operation of all of the Project components, but at a different location. ProStyle Sports is considering an alternate site in Manteca. The Manteca site is at the Airport Way interchange, east of I-5. The bulk of the site is planned OP (office-professional) in the South Manteca General Plan Amendment 93-1 (1993), but opportunity exists to move the site into adjacent property planned Public/Quasi Public Reserve in order to distance the facility from nearby very low-density residential. This site passes all the criteria listed above.

Impacts

Many impacts associated with the Project site in Lodi, would apply to this alternative. Location of the Project at this site would result in visual, biological, geological, land use, public service, and potentially unknown cultural resources. Unlike the Project site in Lodi, this site would not require installation of a new well and would not result in the loss of prime agricultural land as the site is not located within an agricultural preserve. However, the site is located near residences and may affect rural neighborhoods through noise, light, and traffic at

the site. This alternative would result in similar air, noise, and safety impacts as at the project site in Lodi, and would require similar mitigation measures. However, this impact does not meet the goals of the project as it would not be located in the City of Lodi.

Sports Use Only Alternative

The Sports Use Only alternative would reduce the size and capacity of the project by eliminating the dormitory, hotel, restaurant, RV park, and retail facilities. Only the athletic facilities and associated structures such as restrooms and concession stands would be developed on the site. This alternative would decrease land coverage, but may also decrease tax revenue generated on the site by the restaurant and other non-athletic facilities. However, this alternative would result in an increase in recreational opportunities and may positively impact existing hotel, restaurant, and athletic retail establishments in the surrounding community and would create additional revenue for the region as a whole.

One subalternative could be enacted as part of the Project or Sports Use Only alternative. The subalternative would realign Thornton Road with State Route 12 to improve circulation and access to the site. Although the subalternative would not result in changes to land use impacts or economic factors, it could positively impact traffic and circulation around the facility.

Impacts

Impacts associated with the Sports Use Only Alternative include potential impacts to undiscovered cultural resources, increase in demand for public utilities, conversion of farm land (although the land could eventually be converted back to farming use), incompatible land use, geological safety hazards, potential loss of listed species, water supply, public service demand, noise, visual quality, and public safety. Traffic levels would be lower than the levels that would result from the proposed project because the proposed hotel, dormitory, retail center and medical center that draw people to the site on a daily basis would not be in operation. This would also reduce air emissions during construction and operation of the facility. Likewise, the amount of water use and runoff would be less than the proposed project. This alternative would still result in some significant impacts, but these impacts would be to a lesser degree than some of the impacts resulting from the proposed project.

CONCLUSIONS

Reasonable project alternatives have been evaluated and analyzed to determine their feasibility and impacts in comparison to the Project. The Project results in more significant impacts or impacts that result in a higher level of disturbance, than any of the alternatives. However, it also meets all of the goals established by the City and ProStyle Sports.

The analysis of the No Project Alternative contained in this EIR reveals that the No Project Alternative is the environmentally superior alternative because no new impacts would result and the current use of the site to dispose treated water would be maintained. Although this alternative does not meet project objectives, it results in the least number environmental impacts. As discussed in Sections 1 and 5 of this EIR, if the environmentally superior alternative is the "no project" alternative, an additional environmentally superior alternative must be identified.

In addition, the alternate site in Manteca would not result impacts to the Lodi site. However, similar impacts would occur at the Manteca site, which would require an equal level of mitigation. There are a number of other issues associated with this site and its ability to meet the objectives of this project. The Manteca site is located within a floodplain and would require additional safety precautions to prevent flooding hazards to structures and visitors at the sports complex. There are residences adjacent to this site that may be negatively impacted by noise generated during sporting events, creating a use conflict in the area. This site is also limited by sewer capacity and would require extensive service upgrades to adequately meet the needs of the area. In addition, the Escalon Sports Complex is under application review to provide sport facilities in nearby Escalon. Approval and construction of the Escalon Sports Complex would meet most of the recreational needs of the area, and therefore, there would be no need or support for the ProStyle Sports Complex in Manteca. In conclusion, the Manteca site does not support the goals of this project and does not serve to benefit the City of Lodi.

Based on the analysis in previous sections of the EIR, the Sports Use Only alternative is the environmentally superior alternative among the remaining two alternatives. It results in impact reductions to zoning, aesthetics, and construction air quality emissions levels because the supporting, non-recreational facilities would not be constructed. This alternative also meets the primary goals of the project as a sports complex as a variety of sports facilities would be constructed in Lodi that would support use of reclaimed water, yet could still be converted to agricultural use in the future. Therefore, the Sports Use Only Alternative is considered the environmentally superior alternative.